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9 Attorney for Plaintiff,
10 GREAT BOWERY INC. d/b/a
11 TRUNK ARCHIVE

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF OREGON**

14 GREAT BOWERY INC. d/b/a TRUNK
15 ARCHIVE,

16 Plaintiff,

17 v.

18 CASCADE DIGITAL MEDIA LLC;
19 and DOES 1 through 10 inclusive,

20 Defendant.

Case No. 6:20-cv-0009-MK

**DECLARATION OF ANNIE
LEIBOVITZ**

21 **DECLARATION OF ANNIE LEIBOVITZ**

22 I, Annie Leibovitz, declare as follows:

23 1. I am the copyright holder of the Images at issue in this action. I am over the
24 age of 18 years old and I have personal knowledge of the matters stated herein. If
25 called as a witness I could and would testify thereto.

26 2. I have been a professional photographer for over 40 years, and am known for
27 my celebrity portraiture that has been used on numerous covers and magazines.

28 3. On or about November 12, 2014, I entered into an agreement with the
Plaintiff in this action, Great Bowery, Inc. d/b/a Trunk Archive ("Trunk Archive").
That agreement is also referred to as the Artist Agreement.

4. Therein, I granted Trunk Archive the exclusive right to license, market, and
promote images provided by me, including the Images that are the subject of this
DECLARATION OF ANNIE LEIBOVITZ

1 lawsuit.

2 5. The agreement was signed by my agent and manager, Karen Mulligan, with
3 my authorization, on or about November 14, 2014.

4 6. On or about June 12, 2018, I signed a letter authorizing Trunk Archive to
5 enforce my copyright for all matters relating to the infringement of my work,
6 including, but not limited to initiating and prosecuting litigation as in this matter.

7 7. Through these legal instruments, my intention is to have Trunk Archive be
8 the exclusive licensor of my work and enforce my copyright on my behalf.

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10 I declare under penalty of perjury that the foregoing is true and correct under the
11 law of the United States of America.

12 Executed this February 25, 2021, at New York, New York.

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A handwritten signature in black ink, appearing to read 'Annie Leibovitz', is written over the signature line. The signature is fluid and cursive, with a large, sweeping initial 'A'.

Annie Leibovitz